IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

V. Case No. 4:15CR00483

JAMES PATRICK BURKE,

DEFENDANT

DEFENDANT'S MOTION FOR LIMITED TRAVEL

TO THE HONORABLE ALFRED H. BENNETT:

The Defendant in the above styled and numbered cause, James Patrick Burke, respectfully moves the court for Limited travel. In support of this motion, James Patrick Burke would show the Court as follows

I.

James Patrick Burke is currently set for Jury Trial on February 29, 2016 before the Honorable Alfred H. Bennett.

The Court granted a bond with the condition that, James Patrick Burke, reside in Massachusetts under electronic monitoring and home incarceration. Mr. Burke lives in Walpole, Massachusetts and is being supervised by Pre-Trial Services in Boston.

James Patrick Burke asks this Honorable Court to allow him to travel to Bedford, Massachusetts to the Hanscom Air Force Base for completion of military drills/training. At the time of his arrest, James Patrick Burke was active duty military in Texas and is 50 "points" from full military retirement benefits. Defendant, James Patrick Burke, has spoken with his drill instructors from Texas and they have helped him locate a program at the Hanscom Air Force Base that will allow him to complete his service of military duty in the medical command (HHD MEDCOM) under the Massachusetts Army National Guard. Defendant, James Patrick Burke, asks this Honorable Court to allow him to travel to the Hanscome Air Force Base on a daily basis to complete his 50 "points" of service. Counsel does not fully understand the military point calculation but has been informed that the remaining points can be completed in less than one month. Defendant, James Patrick Burke, will still be under electronic and gps monitoring at all times.

II.

Counsel for the Defendant conferred with Assistant United States Attorney Kim Leo, about this motion on January 6, 2016. The government is not opposed to this motion.

James Patrick Burke prays that the Court enter an order allowing limited travel.

Respectfully Submitted,

/s/Mark A. Diaz.

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Attorney for the Defendant,
Angel Andria Gabriel

CERTIFICATE OF SERVICE

I certify that a true and exact copy of the Defendant James Patrick Burke's Motion for Limited Travel was electronically filed using the ECF system which will notify all parties, on the 8th day of January, 2016.

/s/Mark A. Diaz
Mark A. Diaz

CERTIFICATE OF CONFERENCE

I certify that I conferred with Assistant United States Attorney, Kim Leo about this motion on January 8, 2016, and he is unopposed.

/s/Mark A. Diaz
Mark A. Diaz